

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

JOSHUA D. BARINGER
STEPHANIE L. BARINGER
DEBTOR(S)

CASE NO. 1:22-02311 HWV

ROCKET MORTGAGE, LLC f/k/a
QUICKEN LOANS, LLC, f/k/a
QUICKEN LOANS, INC.
MOVANT

CHAPTER 13

11 U.S.C. 362

V.

JOSHUA C. BARINGER
STEPHANIE L. BARINGER

DEBTOR(S)

JACK N. ZAHAROPOULOS
TRUSTEE

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY
UNDER 11 U.S.C. § 362 FILED ON BEHALF OF ROCKET MORTGAGE, LLC**

AND NOW, this 8th day of March, 2023, come the above Debtors, Joshua D. Baringer and Stephanie L. Baringer, by their counsel, CGA Law Firm, E. Haley Rohrbaugh, Esquire and file these answers the Motion for Relief from the Automatic Stay Under 11 U.S.C. § 362 filed on behalf of Rocket Mortgage, LLC as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied that the amount due is as of February 8, 2023 is \$ 133,714.84.

7. Denied. Debtors have made two (2) payments of \$935.00 representing the December of 2022 and January of 2023 payments. Following these two good faith payments, Debtors were approved for a Trial Payment Period, and the first payment is due on or before April 1, 2023, which the Debtors will be making timely.

8. Admitted.

9. Denied.

10. Admitted.

11. Admitted.

WHEREFORE, the Debtors requests that the relief from Stay be denied.

Respectfully submitted,
CGA Law Firm

By: /s/ E. Haley Rohrbaugh
E. Haley Rohrbaugh, Esquire
Sup. Ct. ID No. 323803
135 North George Street
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Telephone: 717-848-4900
(Counsel for Debtor)

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CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on March 8, 2023, I forwarded a true and correct copy of the attached Response upon the following parties in the following manner:

Name	Mode of Service
Brian Nicholas, Esquire KML Law Group, P. C. 701 Market Street, Suite 5000 Philadelphia, PA 19106-1532	ECF
Jack N. Zaharopoulos Trustee	ECF

Respectfully submitted,
CGA Law Firm

By: /s/ E. Haley Rohrbaugh _____
E. Haley Rohrbaugh, Esquire
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